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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

**SECOND MOTION TO STAY
ANSWER DEADLINE**

COMES NOW Defendant, David Chen, by and through his counsel Crowley Fleck, PLLP and presents the following motion to stay.

Plaintiff filed the above-captioned matter on September 30, 2024. On November 12, 2024, by order of Magistrate Judge Hambrick, a 14 day extension to answer was issued requiring the Defendant to respond no later than November 26, 2024. Also on November 12, 2024, the Defendant filed his Motion to Transfer pursuant to 28 USC § 1404(a). Defendant resides and was served outside the District of Wyoming and therefore has until November 29, 2024 to respond to the Complaint.

Defendant anticipates raising significant issues related to the propriety and viability of a number of the claims raised in Plaintiff's complaint. Discovery regarding the issues to be raised and briefing regarding those issues has already been filed in a companion case in the District of Maryland. Defendant believes that judicial economy and the interests of justice would be served by staying the response to the Complaint in order to ensure that the Court with the ultimate authority over this matter evaluate and address the responsive pleadings in this matter.

CERTIFICATION OF CONFERRAL

This Court denied Defendant's previous motion to stay answer deadline due to a failure to certify that Defendant conferred as required with Plaintiff.

Defendant hereby certifies that it conferred with Plaintiff's counsel Amy M. Iberlin regarding both the Motion to Transfer and the Motion to Stay. On November 4, 2024, Plaintiff's counsel notified the undersigned the Plaintiff would oppose both motions.

WHEREFORE Defendant prays for a stay of the Answer date until such time as the court decides the pending motion to transfer.

Dated this 18th day of November, 2024.

CROWLEY FLECK PLLP

/s/ Timothy M. Stubson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on the 18th day of November, 2024, via ECF Electronic filing to the following:

Amy Iberlin
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/s/ Timothy M. Stubson
Timothy M. Stubson